

SECRET

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ADAN BALDERAS FLORES,
[DOB: 12-28-1976],

Defendant.

No. 22-3083-01-CR-S-RK

COUNT 1

18 U.S.C. § 1956(a)(3)(B) and (h)
NMT 20 Years Imprisonment
NMT \$500,000 Fine
NMT 3 Years Supervised Release
Class C Felony

COUNTS 2 and 3

18 U.S.C. § 1956(a)(3)(B)
NMT 20 Years Imprisonment
NMT \$500,000 Fine
NMT 3 Years Supervised Release
Class C Felony

FORFEITURE ALLEGATION

18 U.S.C. § 982(a)(1)

\$100 Special Assessment (Each Count)

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1

Beginning on an unknown date, but at least as early as May 28, 2019, and continuing to on or about January 14, 2020, said dates being approximate, in Greene County, in the Western District of Missouri, and elsewhere, the defendant, **ADAN BALDERAS FLORES**, did knowingly combine, conspire, and agree with other persons, known and unknown to the Grand Jury, to commit money laundering.

It was the purpose and object of the conspiracy to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved what the defendant believed to be proceeds of a specified unlawful activity,

that is, the distribution of cocaine, in violation of Title 21, United States Code, Section 841(a)(1), with the intent to conceal and disguise the nature, location, source, ownership, and control of what the defendant believed to be proceeds of a specified unlawful activity, that is, the distribution of cocaine, in violation of Title 18, United States Code, Section 1956(a)(3)(B), all in violation of Title 18, United States Code, Section 1956(h).

COUNT 2

On or about January 14, 2020, in Greene County, in the Western District of Missouri, the defendant, **ADAN BALDERAS FLORES**, with the intent to conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of a specified unlawful activity, that is, the distribution of cocaine, did knowingly conduct a financial transaction affecting interstate and foreign commerce involving property represented by a law enforcement officer to be proceeds of a specified unlawful activity, that is, the distribution of cocaine, in violation of Title 18, United States Code, Section 1956(a)(3)(B).

COUNT 3

On or about January 14, 2020, in Greene County, in the Western District of Missouri, the defendant, **ADAN BALDERAS FLORES**, with the intent to conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of a specified unlawful activity, that is, the distribution of cocaine, did knowingly conduct a financial transaction affecting interstate and foreign commerce involving property represented by a law enforcement officer to be proceeds of a specified unlawful activity, that is, the distribution of cocaine, in violation of Title 18, United States Code, Section 1956(a)(3)(B).

FORFEITURE ALLEGATION

The allegations in Counts 1 through 3 of this Indictment are re-alleged and fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain

property in which the defendant, **ADAN BALDERAS FLORES**, has an interest, pursuant to the provisions of Title 18, United States Code, Section 982(a)(1), and the procedures outlined in Title 21, United States Code, Section 853.

Upon conviction of any violation of Title 18, United States Code, Section 1956, the defendant shall forfeit to the United States any property, real or personal, involved in such offense, or traceable to such property, pursuant to Title 18, United States Code, Section 982(a)(1).

The property subject to forfeiture includes, but is not limited to, a forfeiture money judgment representing the proceeds obtained by the defendant, in that such sum in aggregate, is involved in, or is derived from, proceeds traceable to the offenses set forth in Counts 1 through 3.

SUBSTITUTE ASSETS

If the property described above as being subject to forfeiture as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of the defendant up to the value of the above-forfeitable property or to seek return of the property to the jurisdiction of the Court so that the property may be seized and forfeited.

All pursuant to the provisions of Title 18, United States Code, Section 982(a)(2) and the procedures outlined in Title 21, United States Code, Section 853(p).

A TRUE BILL

/s/ Monica Stone

FOREPERSON OF THE GRAND JURY

/s/ Jessica R. Eatmon

JESSICA R. EATMON

Assistant United States Attorney

DATED: *7/12/2022*

Springfield, Missouri